

Stephen M. Orlofsky
BLANK ROME, LLP
301 Carnegie Center, 3rd Floor
Princeton, NJ 08540
(609) 750-7700
orlofsky@BlankRome.com

Bruce P. Keller
Jeremy Feigelson
Kristin Lieske Bryan
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, NY 10022
(212) 909-6000
bpkeller@debevoise.com
jfeigelson@debevoise.com
klbryan@debevoise.com

Attorneys for Defendant Viacom, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: NICKELODEON CONSUMER
PRIVACY LITIGATION

MDL No. 2443

No. 2:12-cv-07829-SRC-CLW

Oral Argument Requested

This Document Relates To: ALL CASES

Return Date: November 17, 2014

NOTICE OF MOTION

To:

Barry R. Eichen
Eichen Crutchlow Zaslow
& McElroy, LLP
40 Ethel Road
Edison, NJ 08817
(732) 777-0100
beichen@njadvocates.com
*Attorney for Plaintiffs CAF, CTF,
MP, TP, and AV*

Mary D. Winter
Bartimus Frickleton Robertson
& Gorny
715 Swifts Highway
Jefferson City, MO 65109
(573) 659-4454
marywinter@earthlink.net
*Attorney for Plaintiffs CAF, CTF,
MP, TP, AV, and NJ*

Douglas A. Campbell
Frederick Donald Rapone
Campbell & Levine LLC
310 Grant Street, Suite 1700
Pittsburgh, PA 15219
(412) 261-0310
fdr@camlev.com
Attorneys for Plaintiff K.T.

Andrew Lyskowski
Bergmanis Law Firm, LLC
380 W Hwy 54, Suite 201
P.O. Box 229
Camdenton, MO 65020
(573) 346-2111
Attorney for Plaintiff NJ

Edward D. Robertson, III
James P. Frickleton
Bartimus Frickleton Robertson
& Gorny PC
11150 Overbrook Road
Suite 200
Leawood, KS 66211
(913) 266-2300
jimf@bflawfirm.com
krobertson@bflawfirm.com
Attorneys for Plaintiff NJ

Adam Q Voyles
Lubel Voyles LLP
5020 Montrose Blvd., Ste 800
Houston, TX 77006
(713) 284-5200
Attorney for Plaintiff Stephanie Fryar

Kevin P. Green
Mark C. Goldenberg
Goldenberg Heller Antognoli & Rowland, P.C.
2227 South Route 157
P.O. Box 959
Edwardsville, IL 62025
(618) 656-5150
kevin@ghalaw.com
Attorneys for Plaintiff T.M.

Jeffrey J. Greenbaum
Joshua N. Howley
Sills Cummis & Gross, P.C.
The Legal Center
One Riverfront Plaza
Newark, NJ 07102-5400
(673) 643-7000
jgreenbaum@sillscummis.com
jhowley@sillscummis.com
Attorneys for Defendant Google, Inc.

Tonia O. Klausner
Wilson Sonsini Goodrich & Rosati
1301 Avenue of the Americas, 40th Floor
New York, NY 10019
(212) 497-7706
tklausner@wsgr.com
Attorney for Defendant Google, Inc.

PLEASE TAKE NOTICE that, on November 17, 2014, or as soon thereafter as counsel may be heard, Defendant Viacom, Inc., by and through its attorneys Debevoise & Plimpton LLP and Blank Rome LLP, will move before the Honorable Stanley R. Chesler, United States District

Judge, for an Order granting Defendant's Motion to Dismiss the Second Consolidated Class Action Complaint pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6), and for such other relief as the Court may award.

PLEASE TAKE FURTHER NOTICE that, in support of their Motion, Defendant relies upon the arguments presented in the Memorandum of Law in Support of Defendant Viacom Inc.'s Motion to Dismiss the Second Consolidated Class Action Complaint, the pleadings of the record, and oral argument, which is specifically requested. Also submitted herewith for the Court's consideration is a proposed form of Order.

DATED: October 14, 2014

DEBEVOISE & PLIMPTON LLP

By: /s/ Bruce P. Keller

Stephen M. Orlofsky
BLANK, ROME, LLP
301 Carnegie Center, 3rd Floor
Princeton, NJ 08540
(609) 750-7700
orlofsky@blankrome.com

Bruce P. Keller
Jeremy Feigelson
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, NY 10022
(212) 909-6000
bpkeller@debevoise.com
jfeigelson@debevoise.com

Attorneys for Defendant Viacom, Inc.